

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

*IN RE CATTLE AND BEEF ANTITRUST
LITIGATION*

Case No. 20-cv-1319 (JRT/HB)

This Document Relates To:

All Actions.

PLAINTIFFS' STATEMENT INSTEAD OF REDACTION

Pursuant to Local Rule 5.6 Plaintiffs seek to file Exhibits B, D, E, F, G, H, L, M, N, O, P, Q, R to the Declaration of Daniel O. Herrera under seal because they include content that qualifies as Confidential under the Court's protective order entered in the case and redaction is impracticable.

Dated: July 21, 2022

Respectfully submitted,

/s Daniel O. Herrera

Jennifer W. Sprengel (*pro hac vice*)

Daniel O. Herrera (*pro hac vice*)

Kaitlin Naughton (*pro hac vice*)

**CAFFERTY CLOBES MERIWETHER &
SPRENGEL LLP**

135 S. LaSalle, Suite 3210

Chicago, IL 60603

Tel: 312-782-4880

Fax: 312-782-4485

jsprengel@caffertyclobes.com

dherrera@caffertyclobes.com

knaughton@caffertyclobes.com

Ellen Meriwether (*pro hac vice*)

**CAFFERTY CLOBES MERIWETHER &
SPRENGEL LLP**

205 N. Monroe Street

Daniel E. Gustafson (#202241)

Daniel C. Hedlund (#258337)

Michelle J. Looby (#0388166)

Joshua J. Rissman (#0391500)

Anthony J. Stauber (#0401093)

GUSTAFSON GLUEK PLLC

Canadian Pacific Plaza

120 So. Sixth Street, Suite 2600

Minneapolis, MN 55402

Tel: 612-333-8844

Fax: 612-339-6622

dgustafson@gustafsongluek.com

dhedlund@gustafsongluek.com

mlooby@gustafsongluek.com

jrissman@gustafsongluek.com

tstauber@gustafsongluek.com

Media, PA 19063
Tel: 215-864-2800
Fax: 215-864-2810
emeriwether@caffertyclobes.com

David R. Scott (*pro hac vice*)
Amanda F. Lawrence (*pro hac vice*)
Patrick J. McGahan (*pro hac vice*)
Michael P. Srodoski (Bar No. 0398250)
SCOTT+SCOTT
ATTORNEYS AT LAW LLP
156 Main Street
P.O. Box 192
Colchester, CT 06415
Tel: 860-537-5537
Fax: 860-537-4432
david.scott@scott-scott.com
alawrence@scott-scott.com
pmcgahan@scott-scott.com
msrodoski@scott-scott.com

Christopher M. Burke (*pro hac vice*)
SCOTT+SCOTT
ATTORNEYS AT LAW LLP
600 W. Broadway, Suite 3300
San Diego, CA 92101
Tel: 619-233-4565
Fax: 619-233-0508
cburke@scott-scott.com

Joseph P. Guglielmo (*pro hac vice*)
SCOTT+SCOTT
ATTORNEYS AT LAW LLP
The Helmsley Building
230 Park Avenue, 17th Floor
New York, NY 10169
Tel: 212-223-6444
Fax: 212-223-6334
jguglielmo@scott-scott.com

Dennis J. Stewart (*admitted pro hac vice*)
GUSTAFSON GLUEK PLLC
600 B Street, 17th Floor
San Diego, CA 92101
Tel: 612-333-8844
Fax: 612-339-6622
dstewart@gustafsongluek.com

Adam J. Zapala (*admitted pro hac vice*)
Elizabeth T. Castillo (*admitted pro hac vice*)
James G. Dallal (*admitted pro hac vice*)
COTCHETT, PITRE & MCCARTHY,
LLP
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Tel: 650-697-6000
Fax: 650-697-0577
azapala@cpmlegal.com
ecastillo@cpmlegal.com
jdallal@cpmlegal.com

Alexander E. Barnett (*admitted pro hac vice*)
COTCHETT, PITRE & MCCARTHY,
LLP
40 Worth Street Suite 602
New York, NY 10013
Tel: 212-201-6820
Fax: 917-398-7753
abarnett@cpmlegal.com

Jason S. Hartley (*admitted pro hac vice*)
Jason M. Lindner
Dylan McFarland (*admitted pro hac vice*)
HARTLEY LLP
101 W. Broadway, Suite 820
San Diego, CA 92101
Tel: (619) 400-5822
hartley@hartleyllp.com
lindner@hartleyllp.com
mcfarland@hartleyllp.com

Megan E. Jones (*admitted pro hac vice*)

Interim Co-Lead Counsel for the Cattle Plaintiffs

K. Craig Wildfang (Bar No. 0117043)
Thomas J. Undlin (Bar No. 0183751)
Stacey P. Slaughter (Bar No. 0296971)
Geoff Kozen (Bar No. 0398626)
Eric P. Barstad (Bar No. 0398797)
Austin Hurt (appearance to be filed shortly)

ROBINS KAPLAN LLP

800 LaSalle Avenue, Suite 2800
Minneapolis, MN 55402
Tel: 612-349-8500
Fax: 612-339-4181
kcwildfang@robinskaplan.com
tundlin@robinskaplan.com
sslaughter@robinskaplan.com
gkozen@robinskaplan.com
ebarstad@robinskaplan.com
ahurt@RobinsKaplan.com

Kellie Lerner (*pro hac vice*)

ROBINS KAPLAN LLP

399 Park Avenue, Suite 3600
New York, NY 10022
Tel: 212-980-7400
Fax: 212-980-7499
klerner@robinskaplan.com

Liaison Counsel for the Cattle Plaintiffs

Jonathan W. Cuneo (*pro hac vice*)
Alec Blaine Finley (*pro hac vice*)
CUNEO GILBERT & LADUCA, LLP
4725 Wisconsin Ave. NW, Suite 200
Washington, DC 20002
Tel: 202-789-3960
Fax: 202-789-1813
jonc@cuneolaw.com
bfinley@cuneolaw.com

John W. (“Don”) Barrett (*pro hac vice*)

HAUSFELD LLP

600 Montgomery Street, Suite 3200
San Francisco, CA 94111
Tel: 415-633-1908
mjones@hausfeld.com

Timothy S. Kearns (*admitted pro hac vice*)

HAUSFELD LLP

888 16th St. NW, Suite 300
Washington, DC 20006
Tel: 202-540-7200
tkearns@hausfeld.com

Interim Co-Lead Counsel for the Proposed Direct Purchaser Plaintiffs

Steve W. Berman (*pro hac vice*)

Breanna Van Engelen (*pro hac vice*)

HAGENS BERMAN SOBOL SHAPIRO LLP

1301 Second Avenue, Suite 2000
Seattle, Washington 98101
Tel: 206-623-7292
Fax: 206-623-0594
steve@hbsslaw.com
breannav@hbsslaw.com

Shana E. Scarlett (*pro hac vice*)

Rio S. Pierce (*pro hac vice*)

Abby Wolf (*pro hac vice*)

HAGENS BERMAN SOBOL SHAPIRO LLP

715 Hearst Avenue, Suite 202
Berkeley, California 94710
Tel: 510-725-3000
Fax: 510-725-3001
shanas@hbsslaw.com
riop@hbsslaw.com
abbyw@hbsslaw.com

W. Joseph Bruckner (MN #0147758)

Brian D. Clark (MN #0390069)

David McMullan, Jr. (*pro hac vice*)
Katherine Riley (*pro hac vice*)
Sarah Sterling Aldridge (*pro hac vice*)
BARRETT LAW GROUP, P.A.
404 Court Square N
P.O. Box 927
Lexington, MS 39095
Tel: 662-834-2488
Fax: 662-834-2628
dbarrett@barrettlawgroup.com
dmcmullan@barrettlawgroup.com
kbriley@barrettlawgroup.com
saldridge@barrettlawgroup.com

Shawn M. Raiter (MN#240424)
LARSON KING, LLP
30 E 7th St., Suite 2800
St. Paul, MN 55101-4922
Tel: 651-312-6500
Fax: 651-312-6615
sraiter@larsonking.com

***Interim Co-Lead Counsel for the Commercial
and Institutional Indirect Purchaser
Plaintiffs***

Arielle S. Wagner (MN #0398332)
Kyle Pozan (*pro hac vice*)
R. David Hahn (MN #0401262)
**LOCKRIDGE GRINDAL NAUEN
P.L.L.P.**
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
Tel: 612-339-6900
Fax: 612-339-0981
wjbruckner@locklaw.com
bdclark@locklaw.com
aswagner@locklaw.com
kjpozan@locklaw.com
rdhahn@locklaw.com

***Co-Lead Counsel for Consumer Indirect
Purchaser Plaintiffs***

Patrick J. Ahern
AHERN AND ASSOCIATES, P.C.
Willoughby Tower
8 South Michigan Avenue, Suite 3600
Chicago, Illinois 60603
Tel: (312) 404-3760
patrick.ahern@ahernandassociatespc.com

Patrick J. Lee-O'Halloran (#269074)
**THOMPSON TARASEK LEE-
O'HALLORAN PLLC**
7101 York Avenue South, Suite 255
Edina, MN 55435
Tel: (612) 568-0132
Fax: (612) 564-6976
patrick@ttolaw.com

***Attorneys for Plaintiffs Winn-Dixie
Stores, Inc., and Bi-Lo Holding, LLC***

CERTIFICATE OF SERVICE

I, Daniel O. Herrera, hereby certify that on July 21, 2022, I caused the foregoing to be filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

/s/ Daniel O. Herrera